

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)
) WT Docket 98-143
1998 Biennial Review) RM-9148
- Amendment of Part 97) RM-9150
of the Commission's) RM-9196
Amateur Service rules.)

TO: Federal Communications Commission

COMMENTS OF:

I, James R. Sohl, 6 Cedar Crest Road; HC 67 Box 157; Nogal NM 88341-9709 file these
comments on 23 November 1998, in the FCC's Notice of Proposed Rulemaking, WT Docket No. 98-143.

I commend the FCC for your Proposal to simplify the Amateur Radio Service Rules and Regulations. This
has been needed for many years.

Your proposal covers:

1. Reduce the number of license classes from 6 to 3.
2. Permit additional Amateur licensees to act s volunteers examiners
3. Eliminate Radio Civil Emergency Service (RACES) licensees

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In addition, the Commission wants public input on:

4. Ideas to improve the Amateur Service enforcement process, and
5. Possible changes to the telegraphy requirements and written examinations;

On these items, I feel that you have proposed some great changes for Amateur radio.

On some of the items I have input that I feel is in the public interest, and in the interest of the FCC and the Amateur Radio Service.

Item 1. The FCC noted that we may have too many Amateur License Classes. I agree completely, I feel that three classes is more than needed. I agree with the proposal put forth from the Volunteer Examiners Committee. I am currently an Advanced Class and this is one of the classes that are proposed to be eliminated.

Item 4. Amateur Radio enforcement process:

This is an issue that needs to be addressed and re-addressed until an improvement in Amateur operations is accomplished. Recent changes made by the FCC seem to have made an improvement in this area. I do feel that many Amateurs can provide the FCC volunteer help in this area. I proposed the following:

- a. Locating Amateurs that have professional training in their career fields that can be utilized to provide solid legal evidence that can be used in a court room. The Amateur Auxiliary should not be limited to ARRL members, because the ARRL only has about 25% of the amateur community as members.

- b. Training these Amateur Auxiliary Operators (AAO) to find, and determine operation that violates FCC rules and regulations, collect evidence of abuse, submit evidence and if required testify during any legal hearings. This would be done by both the Amateur Auxiliary (both ARRL and non ARRL) and the FCC. The FCC would act as a advisor / coordinator of all such cases and would be in a position to take said evidence and use in further FCC actions.
- c. The FCC could utilize the AAO for non Amateur needs as well. Such use would require AAO trained amateurs who would volunteer their time and expertise for non amateur needs. This will provide the FCC with a group of trained volunteers that could provide many hours of service at no cost to the FCC.

Item 5. Possible changes to the telegraphy requirements and the written examinations:

The FCC NPRM points out that the requirement for Morse code for an amateur license is no longer valid for many reasons, the main one being:

Technology has created modes of communications that are far more effective in sending and receiving information than using Morse code and,

“The decreasing role of telegraphy as a communications mode also is demonstrated in our implementation of the Global Maritime Distress and Safety System (GMDSS). In permitting GMDSS to replace the mandatory Morse code equipment and operator>>>>”

The current FCC rules require three Morse code levels for current Amateur licensing in the US for operations below 30 MHz. As stated in the NPRM:

“The current International Radio Regulations (IRR) that apply to the Amateur Radio Service require that all amateurs licensed to operate below 30 MHz demonstrate >>>.”

These current regulations are equal to:

All Licensed Drivers who shall operate a vehicle, upon any surface, shall demonstrate their ability to hitch up, by hand, a team of two or more horses to a two wheel or four wheel buggy. This requirement shall be demonstrated to a proper examiner, prior to any vehicle operator license being issued to such an individual. This would be required by all state licensing agencies in the US.

As you can see this is similar to that of requiring Morse code for an Amateur license.

I feel that we need to change the Morse code requirement:

1. The Morse code was Amateur radio's first mode of communications. All amateurs should be allowed to use it if they desire. This history of using CW is from our first days of all forms of radio. We should keep a segment of each Amateur band allocated for such use.
2. But as a requirement for an Amateur radio license, Morse code has no place in today's technology. I feel that we should drop any requirement for Morse code for any license class.

3. But until, we can change the International Radio Regulations, we will need to either waiver our use of that section, such as was done by Japan and possibly other nations that are signatories to the IRR agreements.
4. We could during the time required to change or modify such regulations, set a 5 Word Per Minute test level for all Amateur Radio licenses that operate below 30 MHz. Upon ratification of the IRR the requirement for Morse code should be removed.
5. Now at this time, we could propose that we allow a two level test for each Amateur class license. They could have the option to take a code test and a simpler written test, or a much harder written only test, for the requirements of each test level. I feel that this will not serve the public interest, nor the FCC's as it will make the new rules and testing program more complex than it is today and that is not the direction we seek.

In conclusion, I feel that we need the following, and I recommend that the FCC consider such:

1. Three levels of Amateur Radio Licenses
2. Permit all classes of Amateur Licensee's, except the lowest, to examine all classes, including their own downward.

3. Eliminate the RACES licenses.
4. Improve the Amateur Auxiliary Service to expand the training, and responsibilities of these volunteer operators helping to keep Amateur radio civilized. Also provide the FCC with trained volunteers to assist in support of FCC programs in non-amateur areas.
5. Eliminate all requirements for Morse code in the licensing process, but maintain a Morse code portion of each band, as soon as the IRR can support such a change.

I feel that such actions will be in the best interest of the public, the FCC, and the Amateur community. I have given very careful consideration of such a radical proposal, but have put it forth because:

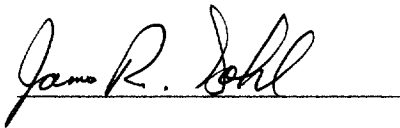
1. I supported the efforts to maintain Morse code all these years, but,
2. I have seen a major break in the Amateur community over this issue, I have seen the no-code technician relegated to that of "almost Amateur" status,
3. I have seen Amateur radio as a whole lose its stature over this issue, but not because of there being a large amount of "codeless" Amateurs, but
4. because of the operators on who passed a code test, have stop treating each other as Amateurs with code VS almost Amateurs with out code,
5. I have known a great many "codeless" amateurs that were great VHF/UHF Amateurs and could be great HF amateurs as well, if Morse code was not an issue,

6. When I passed my first license, some 25 years ago, it was a coded technician, and I was told that someday I might become a good "real ham" when I upgraded. Today I am an Advanced class and it still rankles me, we have become too obsessed over our license class, maybe we need to only have one license class.

My qualifications:

From the early 1960's I held an FCC First Class Radio Telephone License with Ship Radar Endorsement, until the FCC converted it to the General Class Radio Telephone License. I have been a licensed Amateur for more than 25 years and as noted above, reached Advanced level. I have more than 35 years experience in broadcast and industrial communications. I have gone back to using Morse code but still feel it should not be a requirement, but a mode just for fun. I have more than 28 years experience in Search and Rescue and disaster relief support missions. I have worked these as, rescue squad, ground team, medical technician, radio operator, diver, aircrew member, communications officer and pilot.

Respectfully submitted,



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